

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND**

In re:

Swain Landing LaPlata JC, LLC

Debtor.

Case No. 25-184-ELG
(United States Bankruptcy Court
for the District of Columbia)

Claudia Engelhorn, *et al.*

Plaintiffs,

v.

Erik D. Bolog, *et al.*

Defendants.

Case No. 1:25-ap-00159
(United States Bankruptcy Court for
the District of Maryland)

**BOLOG PARTIES' MOTION TO SEAL (A) BOLOG PARTIES' OPPOSITION TO
PLAINTIFFS' MOTION FOR ABSTENTION AND REMAND AND (B) EXHIBIT D OF
GANSLER DECLARATION**

Erik D. Bolog ("Mr. Bolog"), Erik D. Bolog as Trustee of the JAREB Irrevocable Trust, dated October 11, 2021, Science Park Associates, LLC, and Darnestown Road, Inc. (collectively, the "Bolog Parties") respectfully submit this motion pursuant to Local Rule 105-11 of the Local Rules of the United States District Court for the District of Maryland and Rule VII of the Electronic Case Filing Procedures of the Local Bankruptcy Rules of the United States Bankruptcy Court for the District of Maryland for entry of an order substantially in the form attached hereto (the "Proposed Order") sealing *The Bolog Parties' Memorandum of Law in Opposition to Plaintiffs' Motion for Abstention and Remand (ECF No. 43)* (the "Opposition") and the accompanying Exhibit D of the Gansler Declaration (the "Shaw Deposition Excerpts"). In support of this Motion, the Bolog Parties state as follows:

1. The Bolog Parties and other parties to this action have agreed to abide by a protective order governing discovery and the production of documents in this action (the “Protective Order”), modeled after the United States District Court for the District of Maryland’s Stipulated Order Regarding Confidentiality of Discovery Material. *See* Appendix D to the Local Rules of the United States District Court for the District of Maryland.

2. The Bolog Parties file this Motion to request that the Court enter the accompanying Proposed Order (a) instructing the Clerk’s Office to restrict public access to the Opposition and Shaw Deposition Excerpts and (b) authorizing the Bolog Parties to file a redacted version of the Opposition on the public docket.

3. The local rules of this Court contemplate the acceptance of documents for filing under seal: “Any party who seeks to file documents under seal must file a motion to that effect. The proposed sealed documents must be filed separately from the motion, as restricted documents, in accordance with the CM/ECF User Manual.” *See* Rule VII of the Electronic Case Filing Procedures of the Local Bankruptcy Rules of the United States Bankruptcy Court for the District of Maryland. Rule 105-11 of the Local Rules of the United States District Court for the District of Maryland similarly direct a party to file a motion seeking the sealing of any documents filed with the Court.

4. The Shaw Deposition Excerpts and limited portions of the Opposition are confidential because they include references to, or derivations from, certain information that has been designated as Confidential Information by defendant Whiteford, Taylor & Preston LLP or another party in interest pursuant to the Protective Order.

5. Such information concerns the banking and financial information of the parties to this action.

6. The Bolog Parties will promptly file an unredacted copy of the Opposition and Shaw Deposition Excerpts should the Court order that such an unredacted version be filed on the public docket.

WHEREFORE, the Bolog Parties respectfully request that this Court enter the Proposed Order and grant such further and other relief as this Court deems just and proper.

Dated: August 7, 2025

Respectfully submitted,

CADWALADER, WICKERSHAM & TAFT LLP

Respectfully,



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and as Trustee of the JAREB Irrevocable Trust
Agreement dated October 11, 2021; Darnestown
Road, Inc.; and Science Park Associates, LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of August, 2025, a copy of the foregoing was served electronically via CM/ECF, and remaining parties served via first class mail.

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